UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

In re:) Case No. 22-56501-pmb
CUREPOINT, LLC,) Chapter 11
Debtor.))
DAVID A. WENDER, in his capac as CHAPTER 11 TRUSTEE,	ity)) Adv. Proc. No. 22-05171-pmb
Plaintiff,)
V.)
CLG SERVICING, LLC)
Defendan	t.)

FIRST JOINT MOTION TO EXTEND DEADLINES

COME NOW, Plaintiff David A. Wender, in his capacity as Chapter 11

Trustee (the "Trustee") of Debtor Curepoint, LLC (the "Debtor"), and Defendant

CLG Servicing LLC ("Defendant," together with Plaintiff, the "Parties"), and file
this Joint Motion to Extend Deadlines, respectfully showing this Honorable Court
as follows:

1. On April 3, 2023, the Parties filed their *Report of Rule 26(f) Conference*[D.I. 12] (the "Report"), setting forth various case deadlines, including: (i) July 14,

2023 as the deadline to submit a consolidated pretrial order; and (ii) July 14, 2023 as the deadline to file all dispositive motions (collectively, the "July 14th Deadline"). On April 5, 2023, the Court entered the *Order on Rule 26(f) Report* [D.I. 13] (the "Scheduling Order") approving the deadlines set forth in the Report.

- 2. The Parties are currently engaged in good faith settlement negotiations, have made significant headway towards a resolution, and desire to extend these deadlines so that negotiations can continue.
- 3. The Parties request an extension of the July 14th Deadline set forth in the Report and approved by the Scheduling Order by 30 days.

WHEREFORE, the Parties pray for relief as follows:

- (a) That the Scheduling Order be amended so that the July 14th

 Deadline approved therein is extended for an additional 30 days;

 and
- (b) For any other relief that this Court deems just and proper.

Dated: July 14, 2023

/s/ David A. Wender
David A. Wender (748117)
Valerie S. Sanders (625819)

Eversheds Sutherland (US) LLP

/s/ Justin M. Gillman (w/exp. permission)
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Counsel for Defendant CLG Servicing LLC

CERTIFICATE OF SERVICE

This is to certify that on July 14, 2023, a copy of the foregoing document was filed electronically using the Court's CM/ECF system, which will send notification of the filing to all attorneys of record.

/s/ David A. Wender

David A. Wender (748117) Valerie S. Sanders (625819)

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